

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

YIEN-KOO KING,

Plaintiff,

v.

ANDREW WANG, et al.,

Defendant.

Case No: 14-cv-7694

**NOTICE OF DEFENDANTS' OMNIBUS
MOTIONS IN LIMINE**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT, upon the accompanying Memorandum of Law and the Declaration of Akiva Cohen, dated April 9, 2021, and the documents submitted therewith, and the Declaration of Hilton Soniker dated April 6, 2021, and upon all prior pleadings and proceedings herein, that Defendants Andrew Wang, et al. respectfully move this Court, before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, for an Order, pursuant to the Court's Individual Rules for the following:

1. To limit the scope of the trial to issues relating to the 98 Paintings, pursuant to Rule 403 of the Federal Rules of Evidence;

2. To exclude reference to the probate verdict, in whole or in part, as irrelevant and under Rule 403;
3. To exclude evidence of settlement efforts, communications, and documents under Rule 408;
4. To exclude unauthenticated and hearsay evidence relating to certain alleged Chinese auction results;
5. To exclude evidence relating to the so-called “21+4” given Plaintiff’s recantation, at deposition in 2019, of her prior testimony that she and her husband had identified particular paintings as missing from the Decedent’s bank vault;
6. To exclude certain exhibits relating to Chinese museum exhibitions as unauthenticated and/or hearsay;
7. To exclude evidence of Defendants’ wealth as prejudicial and irrelevant absent a nexus to the alleged subsequent “re-sales” of certain of the 98 Paintings; and
8. To exclude evidence of “appreciation damages” as unavailable in this action or, in the alternative, to bifurcate the trial to avoid the significant prejudice to Defendants of having evidence of subsequent appreciation in value available to the jury as it determines liability.

As per the agreement of the Parties in accordance with the Court’s Individual Rules, principal briefs on the Parties’ motions *in limine* are limited to 35 pages, and reply briefs are limited to 20 pages.

Dated: April 9, 2021

Respectfully Submitted,

Kamerman, Uncyk, Soniker & Klein P.C.

/s/ Akira M. Cohen

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